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## Air Enforcement: Arkansas Department of Environmental Quality and Bradley County, Arkansas Wood Products Manufacturing Facility Enter into Consent Administrative Order

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The Arkansas Department of Environmental Quality ("ADEQ") and Potlatch Land & Lumber, LLC ("Potlatch") entered into a June 13th Consent Administrative Order ("CAO") addressing alleged air violations. See LIS No. 17-047.

The CAO provides that Potlatch owns and operates a wood products manufacturing facility located in Warren, Arkansas.

ADEQ is stated to have issued an Air Operating Permit 0356-AOP-R9 ("Permit") to Potlatch on August 27, 2014. The Permit authorized Potlatch to operate a Wood Waste Boiler (SN-02) that uses a multiple cyclone system in tandem with an electrostatic precipitator ("ESP") to control emissions. Further, Specific Condition 4 of the Permit is stated to restrict the discharge of any gases from SN-02 that exhibit opacity greater than 20 percent, except for one 6-minute period per hour of not more than 27 percent opacity.

Potlatch is stated to have submitted in May 6, 2013 correspondence an Initial Notification of Applicability to the United States Environmental Protection Agency and ADEQ informing them that SN-02 is an affected source under 40 C.F.R. Part 63, Subpart DDDDD (Boiler MACT). This regulatory provision is stated to require that opacity be maintained at less than or equal to 10 percent opacity or the highest hourly average opacity reading measured during a performance test run demonstrating compliance with the particulate matter emission limitation. This regulatory requirement mandates that affected sources comply no later than January 31, 2016.

Potlatch is stated to have conducted initial performance testing of SN-02 in accordance with the previously referenced regulatory provision on March 2, 2016. The testing results provided to ADEQ on March 30, 2016 are stated to have indicated that the company had demonstrated initial compliance with the applicable 10 percent opacity limits. The opacity readings measured during the performance test were stated to have averaged 7.57 percent.

A Notification of Compliance Status ("NCS") report was provided to ADEQ on April 22, 2016 in which it was stated that opacity calculated on a daily block average would be used to demonstrate compliance with the Continuous Monitoring System ("CMS"). The Boiler MACT is stated to define daily block average as the arithmetic mean of all valid emission concentrations or parameter levels recorded when a unit is

operating measured over the 24-hour period from 12:00 a.m. to 12:00 a.m., except of periods of startup and shutdown or downtime.

AirTech Environmental Consultants, LLC is stated to have submitted on behalf of Potlatch correspondence on August 9, 2016 noting that on July 1, 2016, after a three-week boiler maintenance shutdown, the CMS at SN-02 began detecting opacity in excess of 10 percent. Upset Conditions Reports (“UCRs”) were stated to have been submitted to ADEQ covering the detectable opacity exceedances. The CAO also notes that:

... From June 30, 2016 through October 10, 2016, Respondent submitted seventy-three (73) UCRs that disclosed daily block opacity averages that ranged from 10.1% to 14.6%.”

Potlatch is stated to have scheduled a rebuild of the ESP that would return opacity to less than 10 percent at the earliest possible time, and determined that as a result of the deteriorating opacity readings from the ESP, further stack testing to establish an interim site specific opacity limit was not appropriate.

AirTech Environmental Consultants, LLC in correspondence dated October 10, 2016 reported that Potlatch has contracted with a company to repair the ESP. Such repairs are scheduled to be completed no later than March 10, 2017.

Potlatch is stated to have requested the applicable annual performance test of SN-02 be changed to not later than June 2, 2017. Such request is stated to have been granted by ADEQ.

The CAO requires that:

- Potlatch complete the applicable annual performance test of SN-02 no later than June 2, 2017
- Potlatch submit a Notification of Intent to conduct the annual performance test referenced in the CAO’s Order and Agreement at least 15 calendar days before the performance test is scheduled to begin
- Potlatch submit the performance test results referenced in the CAO Order and Agreement within 30 calendar days of the date that the performance date was conducted.

A \$25,000 penalty is assessed.

[A copy of the CAO can be downloaded here.](#)